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December 14, 2007

Mr. J. I. Palmer, Jr., Regional Administrator
U.S. EPA, Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303

RE: December 2007 Early Action Progress Report

Dear Mr. Palmer:

In the Fall of 2002, the Environmental Protection Agency (EPA) allowed areas the opportunity to enter into an 8-hour Ozone Early Action Compact (EAC). South Carolina led the nation with forty-five counties electing to participate in the EAC process. By signing the EAC, the counties agreed to implement emission reduction strategies in an effort to attain the 1997 8-hour Ozone standard by December 2007, three years earlier than federally required. In April 2004, when EPA issued boundary designations for the 8-hour Ozone standard, only three areas in South Carolina were designated nonattainment. The Rock Hill-Fort Mill Area Transportation Study (RFATS) Metropolitan Planning Organization (MPO) in York County was designated nonattainment due to their inclusion in the Charlotte Metropolitan Statistical Area. The Columbia Area (portions of Richland and Lexington counties) and the Greenville-Spartanburg-Anderson Area (all of the three counties) were designated nonattainment; however, as a result of their participation in the 8-hour Ozone EAC process, the effective date of their designation was deferred.

As a requirement of the EAC, South Carolina is pleased to submit this EAC Progress Report including documentation showing attainment of the 1997 8-hour Ozone standard. Strong commitments by local stakeholders, including local governments, as well as local industry and environmental groups working together, in conjunction with regional and state-wide efforts, have been successful in South Carolina, and we have the data to support the success of these efforts. Most recent data is evidence that at times when the meteorological patterns are conducive to the formation of ozone, the ozone monitors did not reveal elevated readings. While weather is definitely a factor in the formation of ozone, it is one component that we do not have the ability to control. However, local stakeholders given the flexibility to implement programs geared toward reducing oxides of nitrogen emissions do have an impact on the formation of ozone.

On December 6, 2007, Mr. Scott Reynolds, Director of the Division of Air Quality Analysis submitted documentation certifying that all South Carolina SLAMS ozone ambient monitoring and the associated quality assurance data for the 2007 Ozone Season (through October 2007) were completely submitted to AQS and are accurate to the best of his knowledge. The correspondence included a summary report generated through AQS to provide accurate 2007 ozone summary statistics for the State of South Carolina. A copy of this correspondence and report is included as Enclosure 1. Also included in Enclosure 1 is a table which gives the 4th highest 8-hour average for each of the monitoring sites for the years 2003, 2004, 2005, 2006 and 2007 as well as the three year design values for 2003-2005, 2004-2006 and 2005-2007.

In 2005, South Carolina committed to an annual review of growth (highway mobile and stationary NO_x sources) to ensure emission reduction strategies and growth are adequate as well as identification and quantification of federal, state, and/or local measures indicating sufficient reductions to offset growth estimates. Review of this information indicates that for both areas designated nonattainment with the effective date deferred, the actual emissions were lower than the forecasted modeled data and the 2006 VMT was well below the action trigger. Detailed information with supporting graphs is included in Enclosure 2.

As per EPA guidance, the EAC identified eight key milestones that must be met for continued participation. All participating areas in South Carolina, including those areas designated attainment but electing to continue participation have met all milestones. In addition, each of these counties has submitted semi-annual progress reports every year, beginning with the June 2003 report. This document contains the tenth and final EAC progress report. Enclosure 3 includes the table provided by EPA's guidance document of October 17, 2005, for each participating county identifying each of the local measures included in their respective local early action plan. Additionally, a narrative description of activity from the five counties in the deferred nonattainment areas is included. Information regarding activities that have occurred since June 2007 is included for each county and is grouped by the following areas:

Appalachian: Anderson, Cherokee, Greenville, Oconee, Pickens, Spartanburg
Catawba: Chester, Lancaster, Union, York
Pee Dee: Chesterfield, Darlington, Dillon, Florence, Marion, Marlboro
Waccamaw: Georgetown, Horry, Williamsburg
Santee Lynches: Clarendon, Kershaw, Lee, Sumter
Berkeley-Charleston-Dorchester: Berkeley, Charleston, Dorchester
Low Country: Beaufort, Colleton, Hampton, Jasper
Lower Savannah: Aiken, Allendale, Bamberg, Barnwell, Calhoun, Orangeburg
Central Midlands: Fairfield, Lexington, Newberry, Richland
Upper Savannah: Abbeville, Edgefield, Greenwood, Laurens, Saluda

As pointed out in previous EAC progress reports, the emission reduction strategies submitted by the local areas contain both quantifiable and directionally sound measures. However, it should be noted that none of them were used to demonstrate attainment in 2007. A table and narrative description identifying statewide activities and progress made toward each is included as Enclosure 4 Statewide EAC Activities.

EPA should be commended for allowing areas the opportunity and flexibility to improve air quality by implementing local programs earlier than would be required under federal mandates and for rewarding these areas by deferring the prescriptive requirements of nonattainment. The partnership opportunities developed over the last several years and the awareness of the participants, including local officials, state agencies, universities, organizations, businesses, industries, environmental groups and other stakeholders about air quality issues have resulted in proactive, voluntary and regulatory actions that would not have occurred without the EAC process. The continuing effort of these groups is a marvelous example of partnerships in many directions. Each of these diverse parties has come together for a worthy common goal of providing cleaner air sooner to the citizens of South Carolina. We continue to see activities that remain a part of the EAC process, above and beyond that required of an area with a "traditional" nonattainment designation. These areas could be used as a model to show that implementation of emission reduction strategies earlier than required does bring cleaner air sooner.

South Carolina respectfully requests that EPA review the documentation submitted and expeditiously take final action on the 8-hour Ozone EAC process by re-designating the Columbia Area and the Greenville-Spartanburg-Anderson Area to attainment for the 1997 8-hour Ozone standard.

Thank you not only for the opportunity to participate in the 8-hour Ozone EAC process but for your assistance and support over the last several years. We look forward to continuing to work with EPA and other stakeholders as we continue to encourage implementing measures to achieve cleaner air sooner for our citizens. Should you have questions or desire additional information, please do not hesitate to contact me at (803) 896-8940 or Myra Reece, Chief of the Bureau of Air Quality at (803) 898-4123.

Sincerely,



Robert W. King, Jr., P.E.
Deputy Commissioner
Environmental Quality Control

Enclosures

cc: Kay Prince, EPA Region 4
County Officials (no attachments*)
Ron Methier, GA Dept. of Natural Resources (no attachments*)
Keith Overcash, NC Dept. of Environmental and Natural Resources (no attachments*)
Myra Reece (no attachments*)
EQC Regional Directors (no attachments*)
Scott Reynolds (no attachments*)

*All those not receiving attachments will be notified when materials are placed on our website.

**South Carolina's Ozone Early Action Compact
December 2007 Progress Report
Enclosures
December 14, 2007**

1. 3-Year Ozone Average Summary to Date, AQS Data
South Carolina Certification Correspondence (December 6, 2007)
2. South Carolina's Comprehensive Maintenance Plan
3. Local EAC Activities for Participating Areas
4. Statewide EAC Activities